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April 2, 2012

Via Hand Delivery

Karen Majcher
Vice President, High Cost and Low Income Division
Universal Service Administrative Company
2000 L Street, N.W., Suite 200
Washington, D.C. 20036

FILED/ACCEPTED

APR - 2 2012

Federal Communications Commission
Office of the Secretary

**Re: Annual Compliance Filing of Advantage Cellular Systems, Inc.
WC Docket No. 09-197**

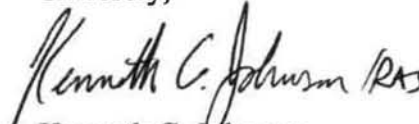
Dear Ms. Majcher:

Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage"), by its attorneys and pursuant to the Federal Communications Commission's Order designating Advantage as an eligible telecommunications carrier, hereby submits documentation detailing among other things: (1) its progress towards meeting its build-out plans; (2) the number of complaints per 1,000 handsets; and (3) the number of unfulfilled requests for service from potential customers.

Also enclosed is a copy of Advantage's compliance filing. Please date-stamp and return it to the courier for our records.

If you have any questions regarding this information, please contact the undersigned.

Sincerely,


Kenneth C. Johnson

Enclosures

cc: Marlene H. Dortch, Office of the Secretary
Federal Communications Commission (via hand delivery and electronic filing)

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Federal-State Joint Board on)
Universal Service)
Advantage Cellular Systems, Inc.)
Application for Designation as an)
Eligible Telecommunications Carrier)
in the State of Tennessee)

WC Docket No. 09-197 FILED/ACCEPTED

APR - 2 2012

Federal Communications Commission
Office of the Secretary

ANNUAL COMPLIANCE FILING OF ADVANTAGE CELLULAR SYSTEMS, INC.

Advantage Cellular Systems, Inc. d/b/a DTC Wireless ("Advantage"), by its attorneys, hereby submits its annual compliance filing required by Section 54.313 of the Federal Communications Commission's ("FCC" or "Commission") Rules,¹ the Commission Order designating Advantage as an eligible telecommunications carrier ("ETC"),² the Commission's *Connect America Fund Order*,³ and the Commission's *Clarification Order*.⁴ Among other things, the *Connect America Fund Order* relocated the current federal annual reporting requirements from Section 54.209(a)(1)-(6) to new Section 54.313 of the Commission's rules and created additional reporting requirements. For ETCs previously designated by the Commission, the *Clarification Order* clarified that, beginning on April 1, 2012, Section 54.313 annual reports will be due annually by April 1 instead of October 1, and provided further guidance pertaining to several additional reporting requirements.

¹ See 47 C.F.R. § 54.313.

² *In re Federal-State Joint Board on Universal Service, Advantage Cellular Systems, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the State of Tennessee*, FCC Docket No. 96-45, Order, DA 04-3357 (October 22, 2004) ("*Designation Order*").

³ See *Connect America Fund* et al., WC Docket No. 10-90 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161, ¶¶ 580-581 (rel. Nov. 18, 2011) ("*Connect America Fund Order*").

⁴ See *Connect America Fund* et al., WC Docket No. 10-90 et al., Order, DA 12-147, ¶¶ 4, 6 (rel. February 3, 2012) ("*Clarification Order*").

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I. Progress Report on Quality Improvement Plan Progress and Use of Support and Additional Five-Year Outlook

Pursuant to Section 54.313(a)(1) of the Commission's rules, Advantage hereby provides at the wire center level a progress report on its five-year service quality improvement plan, including maps detailing its progress towards meeting its plan targets, an explanation of how much universal service support was received and how it was used to improve signal quality, coverage, or capacity, and an explanation regarding any network improvement targets that have not been fulfilled.⁵

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

⁵ See 47 C.F.R. § 54.313(a)(1).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Advantage has attached a map demonstrating Advantage's coverage in its designated ETC area (Cellular Market Area 644, also known as the Tennessee 2 – Cannon Rural Service Area ("TN RSA 2B")) as of March 2012. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Advantage's upgrade plan is consistent with the FCC's goals in the National Broadband Plan ("NBP").

II. Outage Report

Pursuant to Section 54.313(a)(2) of the Commission's rules, Advantage hereby provides detailed information on outages of at least 30 minutes in duration for the prior calendar year for each service area in which Advantage designated potentially affecting (i) at least 10 percent of end users in a designated area or (ii) a 911 special facility.⁶

Since July 1, 2011, Advantage had no service outages of at least 30 minutes in duration for any facility or tower within Advantage's ETC designated service area that potentially affects at least 10

⁶ See 47 C.F.R. § 54.313(a)(2).

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percent of the end users served in such designated area, or that potentially affects a 911 facility, pursuant to the Commission's *Outage Reporting Order*⁷ and Section 4.5(e) of the Commission's rules.⁸

Advantage performs routine maintenance checks on its system to ensure quality service. In order to perform these maintenance checks, Advantage must turn off its service for a maximum of two to three minutes. Advantage performs these checks at night during periods of very low call volume so as not to interrupt service.

III. Service Requests

Pursuant to Section 54.313(a)(3) of the Commission's rules, Advantage hereby provides the number of requests for service from potential customers within Advantage's service areas that were unfulfilled during the prior calendar year.⁹ Since July 1, 2011, Advantage did not have any unfulfilled service requests from potential customers.

IV. Number of Complaints Per 1,000 Handsets or Lines

Pursuant to Section 54.313(a)(4) of the Commission's rules, Advantage hereby provides the number of complaints per 1000 fixed or mobile connections in the prior calendar year.¹⁰ Since July 1, 2011, Advantage has received no complaints per 1,000 handsets as further described below.

V. Price Offerings

Pursuant to Section 54.313(a)(7) of the Commission's rules, Advantage will be required to report its price offerings in a format to be specified by the Wireline Competition Bureau ("WCB").¹¹ Because this rule has not yet taken effect pending approval by the Office of Management and Budget ("OMB"),

⁷ See *New Part 4 of the Commission's Rules Concerning Disruptions to Communications Report and Order and Further Notice of Proposed Rulemaking*, 199 FCC Rcd 16830, 16923-24, § 4.5 (2004) ("*Outage Reporting Order*"). See also 47 C.F.R. § 54.313(a)(2).

⁸ See 47 C.F.R. § 4.5(e).

⁹ See 47 C.F.R. § 54.313(a)(3).

¹⁰ See 47 C.F.R. § 54.313(a)(4).

¹¹ See 47 C.F.R. § 54.313(a)(7).

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Advantage will provide its price offering information in the required format by the as-yet established deadline following the rule's effective date.

VI. Ownership Report

Pursuant to Section 54.313(a)(8) of the Commission's rules, Advantage will be required to report its holding company, operating companies, affiliates and any branding (e.g., a "dba" or "doing-business-as" company or brand designation), including universal service identifiers for each such entity by Study Area Codes.¹² Because this rule has not yet taken effect pending approval by OMB, Advantage will provide this ownership information by the as-yet established deadline for 2012 following the rule's effective date. Furthermore, the Commission's *Clarification Order* indicates that it will provide affected ETCs sufficient time after such approval is obtained to file the required information.¹³

VII. Tribal Lands Report

Pursuant to Section 54.313(a)(9) of the Commission's rules, Advantage will be required to provide, to the extent that it serves Tribal lands, documents or information demonstrating that Advantage had certain discussions with Tribal governments regarding, among other things, needs assessment and deployment planning; feasibility and sustainability planning; marketing services; and rights of way processes.¹⁴ However, the Commission's *Clarification Order* indicates that the Commission requires more time to finalize processes to guide support recipients in such engagements, and the Commission amended the rule to provide that the initial deadline for reporting information pursuant to Section 54.313(a)(9) is April 1, 2013.¹⁵

¹² See 47 C.F.R. § 54.313(a)(8).

¹³ See *Clarification Order* at ¶ 12.

¹⁴ See 47 C.F.R. § 54.313(a)(9).

¹⁵ See *Clarification Order* at ¶ 11.

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VIII. Certifications

Pursuant to Sections 54.313(a)(5)-(6) of the Commission's rules,¹⁶ attached hereto are certifications attesting that Advantage: (1) complies with applicable service quality standards and consumer protection rules; and (2) is able to function in emergency situations as set forth in Section 54.202(a)(2) of the Commission's rules. Certifications that were previously required pursuant to Sections 54.313(a)(7) and Sections 54.313(a)(8) were not relocated to new Section 54.313 of the Commission's rules and therefore are not required in the instant filing.

IX. Conclusion

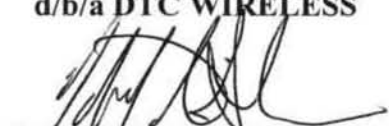
Based on the foregoing information, Advantage hereby satisfies its annual reporting requirements set forth in the *Designation Order*, *Connect America Fund Order*, *Clarification Order* and Section 54.313 of the Commission's rules and maintains its continued eligibility to receive federal universal service support.

Respectfully submitted,

ADVANTAGE CELLULAR SYSTEMS, INC.

d/b/a DTC WIRELESS

By:



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4350 East West Highway
Suite 201
Bethesda, MD 20814
(202) 551-0015

Its Attorneys


Dated: April 1, 2012

¹⁶ See 47 C.F.R. § 54.313(a)(5)-(6).

Declaration of Craig Gates

I, Craig Gates, do hereby declare under penalty of perjury the following:

1. I am the CEO of Advantage Cellular Systems, Inc. d/b/a DTC Wireless.
2. I have read the foregoing "Annual Compliance Filing of Advantage Cellular Systems, Inc." I have personal knowledge of the facts set forth therein, and believe them to be true and correct.



Craig Gates

3-29-12

Date

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EXHIBIT A

REDACTED